

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	4:12-cr-503
	§	(Hon. Lee H. Rosenthal)
JASON DANIEL GANDY	§	

MOTION TO SUBSTITUTE LEAD COUNSEL

COMES NOW JASON DANIEL GANDY, Defendant, through counsel Sean Buckley and files this Motion to Substitute Lead Counsel, showing the Honorable Court as follows:

1. Defendant has engaged undersigned to serve as Lead Counsel through the trial of this case.

Defendant's trial date is set for mid-July, 2018. Understanding that this date is firm, undersigned has agreed to serve as Defendant's lead trial counsel through trial and any further proceedings at the trial court level. Defendant has satisfied undersigned's fee requirements.

Undersigned previously consulted extensively on this case for Defendant and in cooperation with Defendant's prior counsel, but did not enter a formal appearance. As a result of that past involvement, undersigned has an understanding of the factual allegations, procedural history, and other matters that make this case unique.

On June 6, 2018, undersigned discussed this motion with Defendant's current counsel, Dustan Neyland, who indicated his agreement and that he will be pleased to continue as co-counsel for the trial of this case.

2. Relief requested.

Defendant respectfully requests that the Honorable Court allow undersigned to serve as Defendant's Lead Counsel for the trial of this case and through any further proceedings at the trial court level.

Respectfully submitted,

/s/ Sean Buckley
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Certificate of Service

I certify that I provided a copy of this Motion to Substitute Lead Counsel to Assistant United States Attorney Sherri Zack and all parties via the ECF system on this the 7th day of June, 2018.

/s/ Sean Buckley
Sean Buckley